

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

DEANNA LETRAY,

Plaintiff,

v.

JEFFERSON COUNTY; CITY OF
WATERTOWN; COLLEEN O'NEILL, Jefferson
County Sheriff; KRISTOPHER M. SPENCER;
JOEL DETTMER; CHARLES DONOGHUE, City
of Watertown Police Chief; GEORGE
CUMMINGS; SAMUEL WHITE; DEBORAH
DAVIS and PATRICK LARKINS,

Defendants.

20-CV-1194 (FJS)(TWD)

PROPOSED VOIR DIRE

Plaintiff DeAnna LeTray, by and through her counsel, hereby submits the following proposed jury *voir dire* questions for consideration by the Court in connection with this action:

1. Where do you get your news?
2. Have you ever worked in law enforcement or corrections? If so,
 - a) What was your position?
 - b) How long did you have this position?
 - c) How do you feel about that job?
3. Have you ever applied to be a police officer or corrections officer?
4. Have you ever worked for Jefferson County or the City of Watertown? If so,
 - a) What was your position?
 - b) How long did you have this position?
 - c) How do you feel about that job?

5. Have any of your family or close friends ever worked in law enforcement or corrections? If so,

- a) Who?
- b) What was their position?
- c) How long did they have that position?

6. Have any of your friends or family ever applied to be a police officer or corrections officer?

7. Have any of your family or close friends ever worked for Jefferson County or the City of Watertown? If so,

- a) Who?
- b) What was their position?
- c) How long did they have that position?

8. Have you or any of your family or close friends ever been arrested? If so,

- a) What police agency was involved with the arrest?
- b) What were the circumstances of the arrest?

9. Have you or any member of your family or close friends ever been convicted of a crime? If so, please describe the circumstances.

10. Have you or any of your family or close friends ever been to jail or prison?

11. Do you trust the police? When you are in trouble, would you call the police to come help you?

12. Do you believe that you could be impartial in this case, and not be more sympathetic with or give greater credibility to, or in any manner favor the defendants because they hold positions in law enforcement over the plaintiff, Ms. LeTray, who was the subject of an

arrest?

13. Do you think that if someone gets arrested and goes to jail, she deserves whatever happens to her there?

14. Do you feel that people who have been arrested and think they have been treated unfairly or illegally should not bring lawsuits against law enforcement?

15. Do you have any opinions about the Watertown Police Department or Jefferson County Sheriff's Office? What are those opinions? Do you think that law enforcement officials should be given the benefit of the doubt when their conduct is challenged and there is a dispute arising out of their conduct?

16. Plaintiff DeAnna LeTray is a transgender woman. Do you know or have you known anyone who identifies as transgender? In what capacity do you know them?

17. Do you think there is too much public discussion about transgender people and transgender rights?

18. Do you have any opinions or impressions about transgender individuals or members of the LBGTQI community? If so, what are they?

19. Ms. LeTray is alleging the defendant police and corrections officers discriminated against her based on her gender identity and violated her constitutional rights. Even though Ms. LeTray was under arrest at the time of the incident and defendants are law enforcement officials, will you be able to fairly and impartially evaluate her discrimination allegations against defendants?

20. Do you think that money can compensate someone for physical or emotional injuries?

21. What is your familiarity with the field of psychology or psychiatry?

22. Have you heard of Post Traumatic Stress Disorder or PTSD?

23. Do you believe you could impartially and objectively evaluate the testimony of someone with PTSD?

Dated: June 10, 2024
New York, New York

Respectfully submitted,

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